

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

G.B.; S.S.; and individuals similarly situated,

CIVIL CASE NO. 2:24-cv-05884

Plaintiffs,

-against-

**PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION AND
TEMPORARY RESTRAINING ORDER**

NASSAU COUNTY; NASSAU COUNTY
EXECUTIVE BRUCE BLAKEMAN, in his
official capacity,

Defendants.

Plaintiffs G.B. and S.S. (collectively "Plaintiffs") on behalf of themselves and all others similarly situated, by and through undersigned counsel, hereby move this Honorable Court for a Temporary Restraining Order and Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65 to prevent irreparable injury to Plaintiffs.

Defendants Nassau County and Nassau County Executive Bruce Blakeman, in his official capacity, (collectively "Defendants"), have enacted the Mask Transparency Act¹ in violation of the United States Constitution, U.S. Const. Art. VI, cl. 2, the New York State Constitution, Art. IX § 2c, Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12131, *et seq.*, Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794 *et seq.* In support of this motion, Plaintiffs rely on the Complaint, the attached Memorandum of Law, the attached Affidavits, and the attached Exhibits.

WHEREFORE, for all the reasons set forth in this Motion, the Complaint, and Memorandum of Law, Affidavits, and Exhibits, Plaintiffs hereby request that this Honorable Court enjoin the Defendants to stay enforcement of the Mask Transparency Act, necessary to

¹ NASSAU COUNTY, N.Y., MISCELLANEOUS LAWS OF NASSAU COUNTY TITLE 91 (effective August 14, 2024).

prevent imminent harm to Plaintiffs.

DATED: August 22, 2024

Rensselaer, NY

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